

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

FULLTIME FANTASY SPORTS, LLC a
Delaware limited liability company,

Plaintiff,

v.

STEVEN and JANE DOE RINDNER, and
their marital community; MARK and JANE
DOE STIEGLITZ, and their marital
community; DOUG and JANE DOE SMITH,
and their marital community; CRAIG and
JANE DOE MALLITZ, and their marital
community; ROSS and JANE DOE
LEVINSOHN, and their marital community;
ROSS and JANE DOE LUKATSEVITCH, and
their marital community; JOE and JANE DOE
ROBINSON, and their marital community;
TAMMER and JANE DOE FAHMY, and their
marital community; MAYO and JANE DOE
STUNTZ, and their marital community;
JAMES and JANE DOE HECKMAN, and
their marital community, PAUL and JANE
DOE MCNICHOL, and their marital
community thereof; ANDREW and JANE
DOE RUSSELL, and their marital community
thereof; HOWARD and JANE DOE LIPSON,
and their marital community thereof, PILOT
GROUP, GP, LLC, a Delaware corporation;
and JANE and JOHN DOES 1 through 8,

Defendants.

Case No. 2:17-cv-00920-JLR

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE TO FILE JOINT
STATUS REPORT AND DISCOVERY PLAN

Noting Date: September 27, 2017

Pursuant to LCR 10(g), Plaintiff Fulltime Fantasy Sports, LLC and Defendants Tammer Fahmy, Howard Lipson, Ross Lukatsevich, Craig Mallitz, Paul McNicol, Joe Robinson, Andrew Russell, Doug Smith, Mark Stieglitz, and Mayo Stuntz¹ hereby stipulate to and request an extension of the Parties' deadline to file their Joint Status Report and Discovery Plan as set forth in the Court's Order regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. No. 8) as modified by the Parties' previous stipulation and resulting order (Dkt. No. 11).

Good cause exists for the requested extension for the following reasons: Counsel for the Parties conferred by telephone on September 7, 2017. Defendants stated their position that, because Plaintiff asserts a securities-fraud claim brought under Section 10(b) of the Securities Exchange Act of 1934, the Private Securities Litigation Reform Act ("PSLRA") stays all discovery in this case during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). *See* 15 U.S.C. § 78u-4(b)(3)(B). Plaintiff agreed to stipulate to a stay of discovery while the motions to dismiss are pending, without waiving any rights as to whether the PSLRA properly applies to this action or other proceedings.

In light of the foregoing, the Parties further stipulated and agreed that, if the Court denies the motions to dismiss in whole or in part, they will confer again and submit their Joint Status Report and Discovery Plan within 30 days after the order denying the motions in whole or in part.

Dated: September 27, 2017

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¹ The First Amended Complaint lists as additional defendants Jane Doe spouses and the marital communities for each Defendant.

JANE DOE LUKATSEVICH, CRAIG and JANE DOE
MALLITZ, PAUL and JANE DOE McNICHOL, JOE and
JANE DOE ROBINSON, ANDREW and JANE DOE
RUSSELL, and MAYO and JANE DOE STUNTZ

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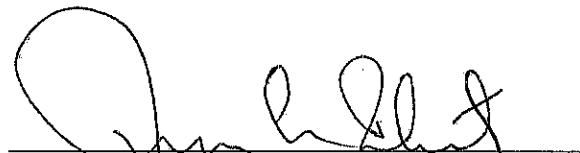
Attorneys for Plaintiff FULLTIME FANTASY SPORTS,
LLC

ORDER

Pursuant to the Parties' stipulation, all discovery in this case is stayed during the pendency of Defendants' motions to dismiss (Dkt. Nos. 18, 20, 21). Within 30 days after an order denying the motions to dismiss in whole or in part, the Parties shall confer and file their Joint Status Report and Discovery Plan.

It is so ORDERED.

Dated: 28 September, 2017



The Honorable James L. Robart
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Christopher B. Durbin

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2017, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE JOINT STATUS REPORT AND DISCOVERY PLAN** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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